

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TRUSTEES OF THE PAVERS AND ROAD BUILDERS
DISTRICT COUNCIL WELFARE, PENSION, AND
ANNUITY FUNDS and THE TRUSTEES OF THE LOCAL
1010 APPRENTICESHIP, SKILL IMPROVEMENT, AND
TRAINING FUND,

Plaintiffs,

-against-

TOROS BROTHERS CONSTRUCTION CORP.,

Defendant.

24 CV 00537 (FB)(MMH)

NOTICE OF MOTION

TO THE CLERK OF THE COURT and COUNSELORS:

PLEASE TAKE NOTICE, that upon the annexed declaration of Adrianna R. Grancio, Esq., dated May 6, 2024, and the exhibits annexed thereto; the annexed declaration of Keith Loscalzo, dated May 6, 2024, and the exhibits annexed thereto; the annexed declaration of Joseph Montelle, dated May 6, 2024, and the exhibits annexed thereto; the annexed declaration of Philip Wilson, dated May 2, 2024, and the exhibits annexed thereto; and the annexed Memorandum of Law, and upon all pleadings and proceedings heretofore had herein, the undersigned, on behalf of the plaintiffs, will move this Court before the Honorable Frederic Block at the United States Courthouse, Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, NY 11201, 30 days from the date of this submission, for an Order granting Plaintiffs' Motion for Default Judgment against Defendant Toros Brothers Construction Corp., and for such other and further relief as the Court deems proper and just.

Dated: New York, New York
May 6, 2024

Respectfully submitted,

VIRGINIA & AMBINDER, LLP

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